

FILED
DISTRICT COURT OF GUAM

FEB 23 2005

MARY L.M. MORAN
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
DANIEL MATSUNO and)
VIVIAN MATSUNO,)
)
Defendant.)

CRIMINAL CASE NO. 05-00009

**UNITED STATES' MOTION
TO RELEASE GRAND JURY
TRANSCRIPTS**

COMES NOW the United States and moves this Honorable Court for an order allowing the release to defense counsel, F. Randall Cunliffe and Rawlen M. Mantanona, of the testimony of the witnesses who appeared before the Grand Jury in this matter and who will testify at trial. Presently, these transcripts are sealed pursuant to Federal Rules of Criminal Procedure 6(e); counsel is entitled to receive them after the witnesses' testimony pursuant to 18 U.S.C. § 3500.

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ORIGINAL

1 This motion is made for the reason that release of this document prior to the testimony of
2 the witnesses will expedite the timely conduct of the trial itself.

3 Respectfully submitted this 23rd day of February, 2005.

4 LEONARDO M. RAPADAS
5 United States Attorney
6 Districts of Guam and NMI

7 By:

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9 KARON V. JOHNSON
10 Assistant U.S. Attorney
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